



CITY OF NORTH ADAMS, MASSACHUSETTS

Office of the Mayor
Thomas W. Bernard

November 13, 2018

The Honorable Ajit V. Pai
Chairman, Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai,

On behalf of the residents and cable subscribers of the City of North Adams, Massachusetts, as well as of the Northern Berkshire Community Television Corporation (NBCTC) – the city’s local access corporation – I strongly disagree with the positions expressed by the Federal Communications Commission (FCC) in its Further Notice of Proposed Rule Making on Cable Franchising (“Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992,” MB Docket 05- 311).

Residents in North Adams depend on and appreciate the range of public, education, and government (PEG) programming provided by NBCTC. In particular, live and recorded coverage of North Adams City Council meetings and other public events provides residents with a direct connection to information, issues, and concerns that directly affect their lives. Beyond local government, PEG programming and the access corporation’s facilities and expertise create opportunities for true and meaningful citizen engagement in the community. The FCC’s proposed rule threatens the future of PEG programming. Enabling cable licensees to reclassify their current franchise fees as in-kind donations would limit the operating capacity of the access corporation and render licensees like Charter Spectrum (the current licensee for North Adams) less responsive to the needs of the communities they serve.

Sustaining NBCTC’s role as PEG provider and community advocate ensures that residents and subscribers in the City of North Adams will continue to enjoy access both to cable services, as intended by the 1984 Cable Act, as well as to content that amplifies local voices, serves local viewers, and strengthens awareness of and participation in our local democracy. Defining “in-kind” support in a manner that puts the licensee’s corporate interests ahead of community needs the rule will further shift the fair balance between local and state authorities and cable operators and will force communities to choose between franchise fees and PEG channels which never was the intent of the Act.

Please reject this proposed rule and act to protect PEG access and access corporations in North Adams and across the United States.

Sincerely,

Mayor

cc: The Honorable Michael O’Reilly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner